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August 2, 2021

VIA ECF

Hon. Alison J. Nathan United States District Court United States Courthouse 40 Foley Square New York, New York 10007

Re: United States v William Tucker
Ind #: 13-CR-378 (AJN)

Dear Judge Nathan:

With respect to the motion filed July 26, 2021 in this matter, Exhibit G to the Declaration of this writer inadvertently contained the wrong two pages of the PSR, instead of the two intended pages from that document. I attach hereto the corrected exhibit, and respectfully request permission of the Court to substitute the attached for that which was filed, and to have the original Exhibit G withdrawn and completely disregarded. I apologize to the Court and the government for this inconvenience.

SO ORDERED.

Thank you very much for your attention

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SO ORDERED.
ALISON I. NATHAN, U.S.D.I.

RAS:sc

Exhibit G

P66319

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

PRESENTENCE INVESTIGATION REPORT

UNITED STATES OF AMERICA)	Docket No.: 0208 1:13CR00378-004(AJN)
vs.)	
WILLIAM TUCKER)	Sentence Date: 07/29/2014
Durana di Cassa di Tanana la la Mana		NL-1

Prepared for:

Honorable Alison J. Nathan

U.S. District Judge

Prepared by:

Selwyn F. Foderingham, Jr.

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Offense:

Count 1:

Conspiracy to Distribute and Possess with Intent to Distribute Narcotics 21 U.S.C. § 846, 21 U.S.C. § 841(b)(1)(B) (lesser included offense) 5 years to 40 years' imprisonment/4 years up to lifetime supervised release/\$5,000,000.00 fine/\$100.00 special assessment

(Class B Felony)

Count 2:

Conspiracy to Commit a Hobbs Act Robbery

18 U.S.C. § 1951, Not more than 20 years' imprisonment/Up to 3 years'

supervised release/\$250,000.00 fine/\$100.00 special assessment

(Class C Felony)

Release Status:

Arrested on 4/22/13, and detained since said date.

Date Report Prepared: 7/2/14 Date Report Revised: 7/22/14

Tucker, William

P66319 - Foderingham, Jr., Selwyn F.

10. On January 29, 2014, DONALD GUNTHER (P66313/S. Foderingham) pleaded guilty to Count 2 (Conspiracy to Commit Hobbs Act Robbery) of 13 CR 378-05(AJN) before the Honorable Alison J. Nathan. Sentencing is scheduled for August 15, 2014.

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11. On July 24, 2013, LEROY CAMPER (P66320/M. Fisher) pleaded guilty to Count 1 (Conspiracy to Distribute and Possess with Intent to Distribute Cocaine and Heroin). Count 2 (Conspiracy to Commit Hobbs Act Robbery), and Count 3 (Using and Carrying a Firearm during and in Relation to a Drug Trafficking Crime and Hobbs Act Robbery) of 13 CR 378-04(AJN) before the Honorable Alison J. Nathan. Sentencing is scheduled for July 31, 2014.

Institutional Adjustment

12. According to a BOP SENTRY inquiry, the defendant has not committed any infractions since being incarcerated.

The Offense Conduct

- 13. This investigation was conducted by agents of the DEA and was based upon observations, conversations with other law enforcement agents and the examination of reports and records. During the course of the investigation, law enforcement agents worked with a witness (CW) and a confidential informant (CI). It is noted that all telephone conversations and meetings were either recorded or surveilled by agents.
- 14. In March 2013, the CW advised agents that he knew an individual, later identified as JOHN THOMPSON, a/k/a "Ya Ya," who participated in home invasion robberies of drug dealers and had connections to crews that conducted these types of robberies.
- During that same month, at agents' direction, the CW called JOHN THOMPSON, and told THOMPSON that he knew of a tipster who had information on a drug trafficking organization that could be robbed. THOMPSON told the CW that he was interested in meeting the tipster and carrying out the robbery. The CW and THOMPSON arranged to meet in New York, NY to further discuss the robbery. The CW told THOMPSON that the tipster would be there.
- 16. On March 16, 2013, the CW and CI-1, who was posing as the tipster, picked up JOHN THOMPSON from the Port Authority Bus Terminal in New York, NY and took him to a restaurant on 34th Street and 10th Avenue. Following the meeting, agents learned that the CW and CI-1 explained to THOMPSON that CI-1 had inside information that a drug trafficking organization planned to ship from Miami, FL to New York, NY multiple kilograms of cocaine and heroin, which could be robbed with force. CI-1 told THOMPSON that CI-1's "girlfriend" would travel with the members of the organization who would be transporting the narcotics shipment, and that she would provide updates to CI-1.